NW Natural, Responses to "Category 3" Comments

BAYUK Dana to: Sean Sheldrake 08/07/2012 12:57 PM
Cc: "'Peterson, Lance'", "Coffey, Scott"

History: This message has been replied to.

Hello Sean.

I inadvertently didn't to send DEQ's replies to NW Natural's responses to the "Category 3" comments. They should have been sent yesterday in DEQ's letter on the Construction Design Report and NW Natural's November 4, 2011 response.

I'm not sure why, but I had saved them in a file separate from the letter. They are included below my contact information for your information and completeness.

If you have questions call.

Dana
Mr. Dana Bayuk, Project Manager
Cleanup & Portland Harbor Section
Oregon Department of Environmental Quality
2020 SW 4th Avenue, Suite 400
Portland, OR 97201
E-mail: bayuk.dana@deq.state.or.us
Phone: 503-229-5543
FAX: 503-229-6899

Please visit our website at http://www.oregon.gov/DEQ/

□ please consider the environment before printing this email

Category 3, Comment 1. DEQ considers NW Natural's comments regarding potential delays to implementing the HC&C system to be unwarranted. DEQ is working with NW Natural with the goal of constructing the HC&C system before the end of 2012. DEQ acknowledges and agrees with NW Natural comment about the completing the uplands risk assessment as soon as possible so the uplands FS can be initiated.

Category 3, Comment 2. NW Natural expresses concern here that DEQ may require the U.S. Moorings site to be included in the groundwater SCMs being designed and implemented on the Gasco Site. In addition, NW Natural indicates that the site characterization associated with this work would cause unacceptable delays in implementing groundwater source control on the Gasco Site. DEQ acknowledges NW Natural's concerns, but does not agree considering U.S. Moorings in the design and/or construction of groundwater SCMs will delay source control implementation.

NW Natural has committed to achieving groundwater source control along shoreline segments 1 and 2. To determine groundwater source control is being achieved for the Alluvium WBZ, NW Natural will monitor and fully evaluate the extent and effectiveness of groundwater capture resulting from operating the HC&C system, including in the northern portion of the Gasco Site. The information provided by NW Natural in the Construction Design Report indicates the HC&C system will capture groundwater in the upper Alluvium WBZ beneath the southern portion of the U.S. Moorings site (see figures 3-2a and 3-2b).

Consequently, NW Natural's evaluations of HC&C system performance and effectiveness will include the southern portion of the U.S. Moorings site.

As discussed in previous correspondence and this letter, work for the Fill WBZ interceptor trench will be conducted after the HC&C system is constructed. NW Natural proposes to prepare and submit a work plan for a geotechnical investigation to evaluate DEQ's requests for the trench length and alignment. This letter indicates the scope of the geotechnical investigation should include the northern portion of the Gasco Site along the property line with U.S. Moorings. Including the area along the property line in the geotechnical investigation and subsequent interceptor trench evaluations will achieve source control of the Fill WBZ sooner than postponing the work to be done separately at a later time.

Category 3, Comment 3. DEQ disagrees with NW Natural's entire comment and stands by our position on the Fill WBZ interceptor trench communicated in the September 22, 2011 letter commenting on the Revised Interim Design Report, the December 7, 2011 letter on the Framework, and this letter.

Category 3, Comment 4. DEQ acknowledges NW Natural's concerns regarding our request to include visual observations of sheen on cross-sections as evidence of DNAPL. The basis for DEQ's request is explained in previous correspondence, most recently in our September 22, 2011 letter commenting on the Revised Interim Design Report. DEQ disagrees with NW Natural on whether sheen is evidence of DNAPL. DEQ considers sheen to be evidence of DNAPL. Furthermore, depending on conditions (e.g., proximity of MGP waste or DNAPL, location and depth of a performance monitoring installation), the appearance of sheen could be used as evidence of DNAPL migration. The purpose of the baseline DNAPL monitoring work is to establish an initial set of conditions that will be used to assess future observations (e.g., appearance of sheen) and make informed decisions regarding the observations.